dates to begin joint testing that AT&T insisted upon in negotiations with SWBT. AT&T has recently informed SWBT they will not be ready for EBI for at least six months. Sprint has also informed SWBT they will not meet their negotiated dates to establish EBI. It's difficult to understand what additional effort SWBT could have made since it has bent over backwards to satisfy AT&T's and other CLECs' ever changing needs and requirements.

24. AT&T would have this Commission believe that SWBT has not made good on its commitments regarding EDI development, forcing AT&T to settle for the EASE system.[18] EASE is simply an alternative that will facilitate the CLECs' prompt entry into our markets on a resale basis. AT&T and the other major CLECs have grossly underestimated the complexity of providing service in the local exchange market and the difficulty of developing an entirely new ordering process (EDI) within the timelines AT&T had projected. However, because EASE is used for SWBT's own internal operations, it will allow CLECs OSS access for resale even before new systems can be implemented to accommodate the divergent needs of various CLECs. AT&T's plan to ultimately use systems other than EASE for its transactions is in no way proof that SWBT has failed to satisfy its requirements under the Act.

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[17] AT&T Dalton ¶ 12
[18] AT&T Dalton ¶ 35

25. AT&T's assertion that nothing has been accomplished regarding development of the OSS interfaces required to support the "UNE platform"[19] is not only incorrect but also disingenuous. First, it should be understood that the concept of "UNE platform" was developed by AT&T seemingly to enable them to acquire resold services at UNE prices. The FCC Interconnection Order provided facilities-based CLECs with the capability to design their own networks using UNEs acquired from an ILEC. Instead, AT&T wants SWBT to define the UNEs necessary to provide a resold service and thus provide AT&T with the capability to avoid the resale requirements of the '96 Act.

26. Regardless of the "UNE platform" dispute, however, SWBT's EDI Gateway and LEX (June 1997) ordering interfaces provide access to OSS functions to support UNEs. The SWBT EDI Gateway is available today and supports the OBF defined UNE elements and combinations, including Loop with Switch Port. SWBT's only requirement is that the CLEC take responsibility for their "leased" network, and specify the type of loop (e.g., 8db or 5db option), switch port (e.g., analog-line side) and switch features (e.g., custom calling, etc.) on the service request for their UNE combination. SWBT has requested dates from AT&T to begin joint testing of this UNE interface and it is AT&T that has been unable to specify its readiness. Underscoring SWBT's commitment, SWBT has also agreed to manual testing of Loop with Switch Port requests (including conversion activity) from AT&T for live customer accounts. The Commission should not allow AT&T to use the "UNE platform" dispute to hide the steps SWBT has taken to establish

[19] AT&T Dalton ¶ 37

viable interfaces for UNE. SWBT has proven that the "UNE platform" is not an OSS issue because SWBT's EDI Gateway can handle loop and switch port combinations today.

27. AT&T claims that SWBT has not provided interface design specifications for AT&T's "UNE platform."[20] In fact, SWBT has provided AT&T extensive UNE documentation and specifications. For example, SWBT has provided specific Local Service Request (LSR) usage documentation of its EDI Gateway interface. SWBT has even gone so far as to document the specifications in the format that AT&T requested (i.e., eye charts). SWBT has not only provided system specifications documentation for UNE, but has taken the extra effort to manually complete LSRs using that documentation to help AT&T understand the system requirements.

28. AT&T states that SWBT is still in the process of clarifying and supplementing its own interface specifications.[21] SWBT does not deny that it continues to enhance its interface documentation. Ongoing changes and enhancements coming from CLEC negotiations as well as from the closure of new OBF issues necessitate ongoing documentation changes and updates. In addition, SWBT continues to learn through its discussions with CLECs of better formats to more effectively convey the information and in areas that require clarification. In order to provide more clarity and be proactive, SWBT is currently completing a new document to communicate LSR ordering requirements based on this

[20] AT&T Dalton ¶ 38
[21] AT&T Dalton ¶ 8

kind of input. However, these efforts should not be misconstrued to indicate that SWBT has not prepared or provided specifications about its electronic interfaces to CLECs. For example, I question how AT&T, the only CLEC currently capable of testing SWBT's EDI Gateway interface, could be implementing EDI without SWBT having shared detailed interface specifications.

29. MCI's assertion that SWBT has refused it access to its OSS systems specifications is equally misplaced.[22] SWBT conducts OSS interface development as part of interconnection negotiations. Joint meetings took place on November 6 and December 9 and 10, 1996. At that time, SWBT explained its plans to follow OBF formats in defining resale and UNE ordering requirements and to utilize ECIC EDI transmissions for batch data exchange. MCI diverted the focus of the negotiations to other issues, slowing OSS negotiations. On February 3, 1997, SWBT provided MCI OSS interface hardware and software specifications and offered to discuss options in detail. Then, on March 20, 1997, SWBT hosted MCI and provided thorough demonstrations of SWBT's OSS interfaces. The afternoon was reserved for MCI representatives to express their OSS interface requirements. MCI attendees focused their comments on UNE methods and procedures, manual order testing, and repeated warnings of their need for prompt manual service order handling. With little or no OSS discussion initiated by MCI, the meeting resorted to SWBT representatives discussing SWBT OSS alternatives and ideas on how to move forward. More recently, OSS working session implementation meetings were held on

May 7 and 8, 1997. In preparation for the meetings, SWBT provided MCI with details on its EDI ordering requirements and several user guides. These meetings were held at the request of MCI, but MCI's desire to discuss other issues only allowed SWBT to further explain its OSS offerings in slightly more detail. Again, SWBT has since offered to hold focused interface meetings when MCI is ready.

30. Interestingly, the day before the May 7, 1997 meeting took place, MCI advised they would pursue the EDI interface, with the goal of having it fully functioning by October 1, 1997. It is difficult for SWBT to understand MCI's complaints about not receiving system specifications from SWBT, yet MCI has received enough information available to make a business commitment to deploy SWBT's EDI Gateway. Also notable, MCI indicated its continuing desire to evaluate EASE and other OSS interfaces. With some direction and focus by MCI, SWBT will again attempt to schedule detailed meetings to provide our EDI interface specifications and establish a joint implementation plan.

31. MCI contradicts itself when it complains that SWBT has not committed to employing the industry conventions for feature identification codes,[23] but then later objects that SWBT has refused to supplement standards in order to make them workable before final industry specifications are released.[24] SWBT is committed to providing parity of service and to following industry standard guidelines, as evidenced by the fact that SWBT has not only

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[22] MCI King ¶ 36,43
[23] MCI King ¶ 62

modified its retail systems (i.e. EASE) for CLEC use, but is aggressively developing LSR/EDI capability. This includes both SWBT's EDI Gateway and LEX offerings. In fact, it was entirely because no CLEC, ILEC, or industry group has been able to establish a sufficient and complete definition of feature codes that SWBT agreed to use internal Universal Service Order Codes (USOC) as a workable solution in order to establish EDI ordering capability ahead of standards. This was done to meet AT&T's supposed business needs and required SWBT to replace programming that was initially developed with the industry codes. This provides conclusive evidence that SWBT is not only committed to industry guidelines, but is also just as committed to the implementation of negotiated interface solutions in advance of standards where technically feasible.

32. AT&T claims that it is increasingly clear that SWBT will not meet the key target dates set forth in the implementation schedule for resale OSS interfaces adopted by the Oklahoma commission in the SBC-AT&T arbitration case.[25] SWBT will indeed meet the resale services dates it committed to meet by June 1, 1997 as specified in the Oklahoma arbitration case. What is in jeopardy, and SWBT has made this public in reports to the Texas commission, is its ability to mechanize complex services in the time frame requested by AT&T. As I explained in paragraph 12 of this affidavit, SWBT handles these types of orders manually with its own customers. Due to the unique and varied arrangements of complex services that can be negotiated with the customer, SWBT has never developed a

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[24] MCI King ¶ 64

[25] AT&T Opposition Comments Brief at 30

front-end interface for its own use to handle complex business services. Nevertheless, at AT&T's request, SWBT has agreed to incorporate complex resale services in its EDI Gateway. This is a very complicated task that takes extensive programming, testing and fields mapping time to accomplish and cannot be completed by the unrealistic target date of July 1, 1997. Based on AT&T's track record of postponing dates in the past for joint testing of the EDI and EBI interfaces as documented in ¶ 14 and ¶ 23 of this affidavit, it would be a surprise if AT&T were ready to proceed with complex services in July.

CAPABILITIES

33. This section provides rebuttal related to specific criticisms made about supposed deficiencies with SWBT's electronic interfaces and their ability to provide CLECs nondiscriminatory access to pre-ordering, ordering, provisioning, maintenance and repair, and billing functions. In addition, other issues not specifically addressed elsewhere in this affidavit will be addressed in this section.

34. SWBT has made available to CLECs pre-order electronic interface capabilities in complete parity with those of SWBT service representatives. SWBT proactively enhanced existing, commercially viable interfaces in advance of industry standards for the pre-ordering process. MCI complains that SWBT's pre-order options (DataGate, Verigate and EASE) are proprietary and thus are inherently inferior. MCI suggests that SWBT develop pre-order capabilities using TCP/IP EDI for the intermediate term until the industry specifies

an electronic bonding long term solution.[26] Consequently, MCI leaves no solution on the table for immediate electronic pre-order access. The fact is, OBF has not issued the pre-order process standards definitions into initial closure. As a result, the TCIF EDI committee has not begun specific EDI mappings to define pre-order standards. No timetable has been set for when this standards work will be complete, much less for when implementation would be realistically achievable. Therefore, for MCI to suggest that SWBT is not providing five of eleven industry standardized pre-order functions electronically[27] is without merit, since there are no national standards to date that define pre-order standards. It is also interesting to note that at a May 7,1997 OSS meeting between SWBT and MCI, no one from MCI was prepared to discuss or even to identify the meaning of the five pre-ordering functions MCI now claims need to be mechanized.

35. MCI is again misinformed regarding industry standards with regard to resale billing. MCI incorrectly states that OBF/TCIF specify Carrier Access Billing System Billing (CABS BOS) is the industry standard for resale billing.[28] The truth is, there is no standard that specifies CABS BOS billing output for resale. SWBT's CRIS EDI provides those data elements that OBF has identified as guidelines for a "minimum set of data elements" that should be available on a resale bill. The CRIS EDI provides for an industry standard 811 Transaction Set that provides flat-rated and usage-sensitive charges in addition to call detail for the calls being billed, and does specify the bill period. Also, the EDI 811

[26] MCI King ¶ 38,39
[27] MCI King ¶ 37

Transaction Set is an industry standard and does not vary from ILEC to ILEC as MCI would have the Commission believe.

36. With regard to UNE billing and in response to MCI,[29] SWBT will bill UNEs with the CABS BOS via a mechanized "Local" Bill Data Tape. The only caveat is that some UNEs currently being billed in CRIS (e.g. AIN) may continue to be billed via CRIS. These would then be available in the industry standard EDI 811 Transaction Set.

37. Regarding MCI's comments about daily usage feeds for calls,[30] SWBT has clarified for MCI how all the types of calls have been identified in MCI's Interconnection Agreement with SWBT (Attachment 8 - Section 5, Provision of Subscriber Usage Data, paragraph 5.1.1.4). Similar language is contained in Sprint's approved agreement in Oklahoma (Attachment 5, Provision of Customer Usage Data-Resale, paragraph 3.1). SWBT has always stated that whatever is billed on the monthly bill as usage sensitive, either for resale or for UNEs, will be included in the daily usage extract feed. MCI, however, has requested that usage for flat-rated local service be provided and also any call attempts. There is no usage recorded for flat-rated local service or call attempts, and thus it cannot be provided on the daily usage extract feed.

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[28] MCI King ¶ 33, 74
[29] MCI King ¶ 76
[30] MCI King ¶ 73

DOJ POSITION ON WHOLESALE PROCESS

38. In its comments, the Department of Justice ("DOJ") has chosen to ignore operational support system (OSS) functions information provided by SWBT to the Department in meetings and correspondence, my previous affidavit, and SWBT electronic interfaces demonstrations.

Background

39. On January 31, 1997 in Dallas, representatives from the Commission and the DOJ attended a meeting with SWBT personnel. The intent of this meeting was to demonstrate the electronic interfaces to Operations Support Systems (OSS) functions SWBT had made available to CLECs. The attendees also toured the LSPSC and witnessed the processing of CLEC orders in a manual environment. Along with others, Messrs. Stuart Kupinsky, Gerald Lumer, and Jonathan Lee were in attendance from the DOJ, as was Chuck Hempfling consultant to the DOJ.

40. At the conclusion of the demonstration, Martin Grambow, SBC, asked Mr. Kupinsky whether SWBT was on target with respect to OSS functionality, and did Mr. Kupinsky identify any major problems with SWBT's approach. Mr. Kupinsky replied that it seemed that SWBT had provided a lot more functionality than the other RBOCs. In addition, SWBT had provided the CLECs with electronic interface options. He added that the consolidation of applications on the SWBT Toolbar platform seemed helpful and that the channel assignment status capability of Verigate was unlike anything he has seen anywhere

else. In terms of functionality, Mr. Kupinsky stated that it seemed as if SWBT was providing parity to what its retail customer service representatives had.

41. Mr. Grambow stated that SWBT intended to keep refining its OSS options and working with the Department and FCC staff to ensure that it was providing all that was required to satisfy the checklist requirements. Mr. Kupinsky replied that the Department would like to work with SWBT in that respect. Mr. Kupinsky stated that it was very helpful to the staff to hear how SWBT had developed the OSS options it was offering.

42. SWBT has relied on the Department to do what it said, "to work with SWBT." However, the work the Department has done appears to be with the large CLECs. What once was considered by SWBT to be a positive perspective from the Department is now deemed not in compliance. The Department now says SBC has failed to offer adequate functionality, as stated on page 89 of Appendix A. In the following paragraphs, I will reply to specific issues raised or positions taken by the DOJ, not already discussed elsewhere in this affidavit..

SWBT Responses

43. The DOJ has unilaterally established its own criteria for evaluating BOC compliance with the checklist. First, it asserts that wholesale support processes must be automated if the volume of transactions would, in the absence of such automation, cause considerable

inefficiencies and significantly impede competitive entry.[31] There is nothing in the Act or in the Commission's Orders that require the automation of manual processes. While SWBT is a leading telecommunications company in the automation of processes and has taken a proactive role in providing electronic interface choices to CLECs, our only requirement is to provide nondiscriminatory parity with a BOC's retail operations and to respond appropriately to CLECs' requests for new forms of access. If a current process is handled manually today by our retail operations, SWBT's core obligation is to make that process available to CLECs in the same way. There is no further duty to develop automated processes absent a CLEC's technically feasible request and commitment to pay.

44. Another situation where the DOJ has taken it upon itself to establish evaluation criteria for compliance is that BOCs must build electronic transaction interfaces,[32] also known as application-to-application interfaces. Although SWBT has enhanced its DataGate pre-ordering interface and developed its EDI Gateway for ordering, there is no legal requirement for these types of interfaces. Large CLECs, however, claim that SWBT's systems limit the ability to transfer information electronically to their internal OSSs and require CLEC service representatives to act as a manual buffer between SWBT's system and the CLECs internal applications.

[31] DOJ C1.a. at 28
[32] DOJ Appendix A at 69

45. SWBT has recognized that the large CLECs will have their own customer care and billing systems. In an effort to make the EASE system as compatible with CLEC systems as possible, SWBT makes available to CLECs an electronic file transmission each day, reflecting all the previous day's distributed service orders. We developed this capability so CLECs can mechanically populate their own systems and not have to perform manual dual entry of data. Therefore, for the DOJ to state that as a practical matter, SWBT's ability to receive orders for resale and UNEs from carriers with their own OSSs rests exclusively on its EDI interface[33] is obviously without merit when it comes to EASE's capability for resold services.

46. The DOJ states that EASE, "when operational" may fulfill the needs of small CLECs without their own OSSs, but will not meet the needs of large CLECs with their own robust OSSs.[34] As detailed in paragraph 10 of this affidavit, EASE processes thousands of orders daily for our retail customers and is in fact operational. AT&T, a large CLEC with its own robust OSS network, has committed to utilizing residence EASE beginning this month. AT&T has chosen to use EASE to serve the residence resale market in spite of the fact that detailed LSR/EDI negotiations for the same functions have been completed between our companies. Although AT&T may alter its processes in order to integrate EASE into its operation, that integration and deployment of EASE will be completed and operational sooner than their new EDI process. This is indicative of the fact that building

[33] DOJ Appendix A at 76

an OSS infrastructure for the ordering/provisioning of local service is complex and takes time. SWBT recognized this early on, and that is why SWBT offers multiple choices of electronic interfaces to meet the needs of all CLECs regardless of size and information technology capability.

47. SWBT has "exceeded" its obligations under the Act and FCC rules because it has made a range of electronic interfaces available to CLECs, and not as the DOJ claims, solely because it has developed an EDI interface.[35] For example, SWBT offers the same system (EASE) that our retail organizations use with our end user customers in addition to offering an EDI interface. In addition, our newest resale and UNE ordering application, Local Service Request EXchange System (LEX), a graphical user interface, will allow CLECs without EDI capability to mechanically create and submit national standard formatted Local Service Requests (LSRs). SWBT will trial LEX beginning in June 1997 with two CLECs.

48 Valu-Line of Kansas has begun utilizing EASE to process resold services electronically. There were some start-up problems for Valu-Line, not atypical of when SWBT deploys a new application in one of its centers. However, since Valu-Line wrote a letter (at the

[34] DOJ Appendix A at 74
[35] DOJ Appendix A at 77

request of the DOJ) to the Department expressing their implementation problems,[36] SWBT is responding to Valu-Line's allegations in Attachment B of this affidavit.

49. The DOJ claims that SWBT has actively thwarted competitors attempts to develop and test interfaces to SWBT's OSSs.[37] The prime example used to make this claim is a quote from MCI's King affidavit in ¶ 35, where Mr. King states that SWBT has refused to allow MCI to submit test orders in Missouri or Texas until MCI had a signed interconnection agreement and was a certified carrier in those states. To set the record straight, the "live" test orders MCI wanted to send to SWBT were going to be submitted manually by MCI, and not intended to test any of SWBT's electronic interfaces. Indeed, this was not even an OSS issue. SWBT is steadfast in its position that it should only work with CLECs in the provision of "live" service under the terms of a negotiated and effective interconnection agreement and where the CLECs advises SWBT that they have been certified to provide local exchange services in that state. This policy makes the best use of SWBT's resources and implementation considerations for CLECs with negotiated and approved agreements (66 as of 5/19/97) throughout our five state region. At the time, MCI had neither. Once MCI and SWBT negotiated an interconnection agreement, SWBT agreed to notify the state commissions of its plans to support a manual trial with MCI prior to state certification. SWBT's actions not only demonstrate our commitment to

[36] DOJ TAB G attachment - Valu Line of Kansas Letter dated May 8, 1997
[37] DOJ d.2 at 59

foster competition, but also shows SWBT's flexibility in modifying its policy of not waiting for state certification to accommodate CLECs requests for trials.

50. The other example the DOJ uses to claim that SWBT has thwarted competitors is where AT&T, MCI, and Sprint have expressed that SWBT delayed the provision of information needed to begin development of interfaces to SWBT.[38] Paragraphs 26 and 27 of this affidavit address specific claims of lack of technical specifications by AT&T and MCI respectively. However, because of the DOJ's strong allegations that SWBT has purposely delayed the dissemination of technical information to these CLECs, an explanation of the facts is warranted. While it should be recognized that OSS negotiation and implementation progress with each CLEC varies, SWBT's provision of OSS documentation to CLECs ranges from simple brochures to complex technical interface requirements, depending on the negotiation phase, type of interface and level of interest demonstrated by the CLEC.

51. Over the past year, SWBT has held countless meetings with AT&T on OSS interface development and provided AT&T all documentation it has requested. Until recently, Sprint and MCI have not been prepared or interested to discuss OSS implementation in such detail. During the second quarter of 1997, Sprint and MCI requested detailed OSS implementation meetings that warranted review of SWBT's EDI Gateway interface

[38] DOJ d.2 at 59

documentation. In March, SWBT provided MCI and Sprint its EDI ordering requirements document in preparation for these meetings. During separate meetings, neither MCI and Sprint were prepared to discuss the EDI ordering interface, or any interfaces in detail. Instead, these meetings involved a high level review of interface capabilities so that MCI and Sprint could determine and set direction on which interfaces will meet their market entry and information services objectives. SWBT is ready to hold additional meetings and provide whatever information is necessary to document and clarify any question or requirements of our interfaces. Again, it is hard to understand how these allegations could have been made by these CLECs without any basis of facts and more importantly, for the DOJ to blindly accept the allegations as fact.

52. The DOJ must misunderstand SWBT efforts when it states SBC has failed to make resale services and UNEs practicably available because of lack of adequate automation.[39] SWBT's EASE interface provides the capability of order flow-through for basic residence and business services. SWBT's EDI Gateway has also been designed for mechanized order flow-through to downstream OSSs. SWBT has developed complete flow-through for the highest volume orders (e.g., POTS resale conversions) and plans to continue to automate other types of orders (e.g., resale new connects, disconnects, etc.) in the priority of expected demand.

[39] DOJ TAB A at 78

53. As I have previously detailed in paragraphs 25 and 26 of this affidavit, SWBT has developed its EDI interface (and is completing LEX) for UNEs to enable CLECs to electronically order not only individual UNEs but combinations as well. Consequently, both the DOJ's statements regarding lack of UNE automation and failure to support electronic ordering/provisioning capability for combinations of UNE are at best confusing. Both, SWBT's EDI Gateway and LEX interfaces fully support the electronic ordering of all unbundled elements and combinations as are currently defined by the OBF, including the Loop with Switch Port combination.

CONCLUSION

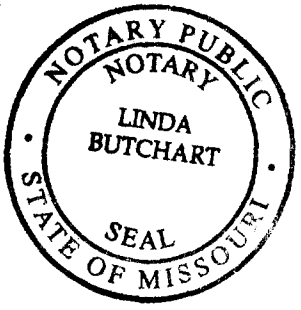
54. SWBT is providing a variety of electronic choices for all CLECs entering the local market. SWBT has followed national standards for all five OSS functions where they exist and will continue to deploy the same as they are finalized. SWBT will provide assistance to CLECs that wish to use SWBT's electronic OSS interfaces. SWBT meets the requirements of the Act and is in compliance with the FCC's orders in terms of providing CLECs with "at least equivalent electronic access" to its OSS functions that it provides "to itself, its customers, or other carriers." SWBT has also gone even further to provide CLECs with choices of both industry standardized interfaces and negotiated interim interfaces for access to its OSS functions that it did not provide to itself, its retail customers, or other carriers prior to the Act.

The foregoing affidavit is true and correct to the best of my knowledge, information, and belief.

Elizabeth A. Ham

ELIZABETH A. HAM
EXECUTIVE DIRECTOR - INTERCONNECTION & RESALE
SOUTHWESTERN BELL TELEPHONE COMPANY

Subscriber and sworn before me, the undersigned authority, on this 20th day of MAY, 1997.



Linda Butchart

NOTARY PUBLIC

LINDA BUTCHART
NOTARY PUBLIC STATE OF MISSOURI
ST LOUIS COUNTY
MY COMMISSION EXP NOV 19,1998

ATTACHMENT A

SWBT EDI ORDERING INTERFACE TESTING SUMMARY

Attachment A

May 22, 1997

SWBT EDI Ordering Interface Testing Summary

Receive/edit/format/send EDI records

- Unit tests began in December, 1996 to test new orders, disconnects, transfer as is, loop, port, loop with port, hunting, directory listing, and directory delivery.
- From 8 to 10 runs per case were done to test and modify the maps and application programs.
- Files were sent for downstream processing with each case doing 6 to 10 test runs.
- Data received from AT&T was used for an additional test 2 to 3 times to validate mapping and pass downstream for combination editing.
- EDI handling of acknowledgments and the FOC/SOC processing were tested 2 times.
- Generation of EDI transactions for 997, 855, and 865 record types were tested approximately 10 times each.
    - 977 acknowledges the receipt of the EDI record; 855 acknowledges the processing or errors found in the initial service order that was transmitted; 865 acknowledges the processing or errors found in any supplements to the original order and also sends completion notices after the order is provisioned.
- System testing with AT&T began in April 1997.
- During the week of May 12, testing was performed with files sent from AT&T which included a "test" new connect, a supplement and a conversion order.

Perform data and relational edits and create downstream feeds

- Initial unit testing of the various programs in this system involved over 1000 tests conducted in early 1997.
- Formal integrated component testing began in March 1997.
- These formal tests involved the creation of batches of test orders, running them through front-end edits, creating error files to be returned and creating a file to send for downstream mechanized order generation processing.
- Additional tests involving the FOC/SOC process were done in April.

- A full system test began on May 20, 1997 using over 150 test cases and test service orders.
- A Test Base of 161 orders has been created to use in our Regression testing. The breakdown of these orders include 50 orders for resale and resale with directory, 26 loop orders, 13 loop with Interim Number Portability, 8 Interim Number Portability, 32 port orders, 7 directory, and 12 loop with port. Regression testing includes new installs, changes, disconnects, outside moves, conversions with changes, suspends, restores, conversion to new, conversion as is, seasonals, and record changes.
- AT&T sent the first order that passed all our edits on May 14.
- The "live" trial with AT&T began on May 20, 1997.

Generation of Firm Order Confirmation(FOC) and Service Order Completion (SOC)

- Unit testing started in October 1996.
- Over 235 tests involving originating, confirmation, completions and error orders. These ranged from simple orders to complex orders that had many circuits and telephone numbers.
- Went into live production in February, 1997.

Mechanized Order Generator enhancements

- Unit testing of the "driver" component began in September, 1996.
- Approximately 100 tests were done consisting of 80 tests of conversion orders, 10 disconnect tests, and 10 cut/restore tests.
- An additional 12 integrated tests were conducted in conjunction with receiving data passed from the upstream system, including 2 tests performed using data that had been provided by AT&T.
- Unit testing of "order generation" components began in November, 1996.
- Over 175 unit tests were performed to create new connect, conversion, disconnect and cut/restore orders and to test programs that reported on orders past due.

ATTACHMENT B

SWBT REPLY TO VALU-LINE'S LETTER

ATTACHMENT B

SOUTHWESTERN BELL TELEPHONE'S REPLY TO VALU-LINE'S LETTER

Southwestern Bell Telephone (SWBT) submits the following in response to the May 8, 1997, Valu-Line of Kansas (VLK) letter addressed to Mr. Jonathan D. Lee. This letter was included as Tab G in the Attachments to the U.S. Department of Justice's evaluation of the SBC's Section 271 filing in Oklahoma.

A. CONVERSION CHARGES

1. The specific examples that VLK (VLK at 1) cites regarding SWBT's conversion order rates accurately represent the applicable charges. VLK's contract language states that a "per order conversion charge" will apply. While SWBT regrets the misunderstanding that VLK had regarding the definition of an "order," the intent of that language has always been to recover the cost associated with the amount of service order activity the Local Service Provider Service Center (LSPSC) incurs to handle conversion requests.

2. The SWBT cost study which supports the $25.00 per order charge is based, in large part, on the average time it takes a service representative to handle a conversion service order. Defining this order activity as "per billable", rather than "per billed", telephone number may be the source of the confusion. However, this definition more accurately reflects the work involved and the costs associated with the manual processing of conversion orders. Where a "billed" telephone number may have many billable telephone numbers associated with it, and therefore require a multitude of service orders to process the request, a "billable" telephone number

is defined as "any number that could receive its own bill." On March 12, 1997, as soon as this misunderstanding was brought to SWBT's attention, VLK was provided with detailed, written clarification of how this charge is administered. This charge is not a "per telephone" number charge as stated by VLK. If that were the case, the business customer in VLK's example would have been charged an additional $25.00 for the second hunting line. Since that telephone number cannot receive a standalone bill, and does not generate additional service order activity, it receives a single conversion charge for the service order work activity associated with the request.

B. NEGOTIATIONS

1. The first negotiation meeting between SWBT and VLK was held on November 14, 1996. In response to VLK's request for Operations Support Systems (OSS) interfaces, SWBT expressed that OSS interfaces would become available on January 1, 1997 and offered to continue OSS negotiations and discussions at that time. VLK did not object to this offer. It was not until March 1997 that VLK pursued access to OSS functionality for local exchange services. This VLK request was directed to their SWBT Competitive Provider Account Manager. It was found that VLK had also begun other electronic interface connectivity with SWBT, but via their interexchange carrier account management contact.

2. At VLK's request on March 6, 1997, SWBT quickly established OSS negotiations on March 7, 1997, that included providing the OSS appendix, as well as discussing rates and the required training opportunity for Residence EASE (REASE) and Business EASE (BEASE). In advance of a signed OSS Appendix, Mr. Nathan